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February 11, 2025

Via ECF

Honorable Carol Bagley Amon
United States District Court
Eastern District of New York
225 Cadman Plaza East, Courtroom 10D South
Brooklyn, New York 11201

Re: *Tatari v. Durust*
Case No. 1:24-cv-06930-CBA-SJB

Dear Judge Amon:

Counsel for Petitioner, Onur Tatari, submits this letter to respectfully request an extension of the deadline for the Petitioner to file for attorney's fees and costs in connection with the above-referenced matter.

The evidentiary hearing for this matter was held before Your Honor on December 11, 2024 and December 12, 2024. On January 29, 2025, this Court issued a Memorandum & Order (the "Order") granting Petitioner's petition and ordering that O.T. be returned to Turkey within fourteen (14) days [ECF No. 67]. On February 3, 2025, the Respondent filed a Notice of Appeal [ECF No. 70] from this Court's Order and a motion to stay that order pending appeal. [ECF No. 70].

The appeal of this matter will inevitably lead to further attorney's fees and costs for the Petitioner. For that reason, Petitioner is requesting an extension of the deadline to file for attorney's fees and costs until the appeal is concluded.

On February 11, 2025, counsel for Petitioner asked counsel for Respondent if they had any objection to Petitioner seeking an extension of this deadline. Counsel for Respondent has not yet indicated whether they would consent to the deadline extension or not.

Respectfully,

/s/Richard Min
Richard Min
Attorney for Petitioner

cc: All Counsel (by ECF)